

5. Defendant is a limited liability company with its principal place of business in Monroe, Louisiana. The principal business purpose of Defendant is the collection of debts in Missouri and nationwide, and Defendant regularly attempts to collect debts alleged to be due another.

6. Defendant is engaged in the collection of debts from consumers using the mail. Defendant is a “debt collector” as defined by the FDCPA. 15 U.S.C. § 1692a(6).

FACTS

7. Defendant’s collection activity consists of dunning letters sent to Plaintiff.

8. Defendant sent Plaintiff a written communication on or about August 13, 2014.

9. Defendant’s August 13th letter stated that the alleged debt was from “SOUTH COUNTY RADIOLOGISTS-IMAGING” in the amount of \$17.44.

10. Defendant’s letter stated that “Failure to make satisfactory arrangements within 30 days will only result in damage to your credit for the next 7 years.”

11. Defendant did not have permission to make such a threat on such a debt totaling \$17.44.

12. Defendant’s letter further stated that “Your prompt remittance is vital in order to avoid enforceable actions with legal counsel.

13. Defendant did not have permission to make threats of legal action on a debt totaling \$17.44.

14. As of the date of this lawsuit, Defendant has never sued Plaintiff.

15. Upon receipt of this letter, Plaintiff was concerned that litigation was eminent.

16. Defendant’s collection attempts have caused Plaintiff to incur actual damages including but not limited to cellular phone charges, anxiety, sleeplessness, and worry.

COUNT I: VIOLATIONS OF THE FDCPA

17. Plaintiff re-alleges and incorporates by reference all of the above paragraphs.

18. In its attempts to collect the alleged debt from Plaintiff, Defendant has committed violations of the FDCPA, *15 USC 1692 et. seq.*, including, but not limited to, the following:

a. Using unfair, oppressive, and misleading means to collect or attempt to collect the alleged debt. 15 U.S.C. § 1692d-f.

b. Threatening action without the authority or intent to take such action, including but not limited to threatening legal action against Plaintiff. 15 U.S.C. § 1692e.

WHEREFORE, Plaintiff respectfully requests that judgment be entered against Defendant for:

- A. Judgment that Defendant's conduct violated the FDCPA;
- B. Actual damages;
- C. Release of the alleged debt;
- D. Statutory damages, costs and reasonable attorney's fees pursuant to 15 USC 1692(k); and
- E. For such other relief as the Court may deem just and proper.

THE EASON LAW FIRM, LLC

s/ James W. Eason

JAMES W. EASON, #57112
124 Gay Avenue, Suite 200
St. Louis, Missouri 63105
Phone: (314) 932-1066
Fax: (314) 667-3161
Email: james.w.eason@gmail.com